REMARKS

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1-28 were pending prior to the Office Action. Claims 29-44 are added in this reply. Claims 1, 6, 11 and 16 are independent.

§ 103 REJECTION – RHOADS, BANTON, KENNER

Claims 1-15 and 25-27 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Rhoads (U.S. Patent 5,850,481) in view of Banton et al. (U.S. Patent 5,404,411) and Kenner et al. (U.S. Patent 5,956,716). *See Office Action, Item 5.* Applicant respectfully traverses.

Independent claim 1 recites, in part, "printing the processed image data, wherein the processed image data includes a portion of the equivalent original picture data read from the storage means that corresponds to the at least the portion of the original picture in the initial image data." Contrary to the Examiner's allegation, Rhoads cannot teach or suggest at least this feature.

Rhoads is directed toward a system to embed identification codes in electronic, optical and physical media so that unauthorized copies may be detected. Rhoads discloses that a composite image for distribution is created by embedding the identification into an original image. *See Rhoads, Figure 2,*

Step 10; Column 9, line 27 - Column 10, line 3. Afterwards, the original image and the identification codes are stored away separately.

As illustrated in Figure 3 of Rhoads, the detection process is as follows. When the suspect image is obtained, the original image is subtracted from the suspect image providing a difference signal or difference image. *See Rhoads, Figure 3, Step 9; Column 11, lines 31-34.* This difference image then may be printed out and checked against known identification codes. If the identification code is detected, actions may be taken to enforce copyrights (*See Figure 3, Step 14*).

It is noted that the only image data that results after the comparison of the suspect image signal with the original image signal is the difference image signal. This difference image signal contains at best only the identification code and random noise that are normally present. In other words, the difference image contains no information related to the original image. This is logical since the difference image is created by subtracting the original image from the suspect image. Thus, contrary to the Examiner's allegation, Rhoads cannot teach or suggest the feature of the process image data that includes a portion of the equivalent original picture data read from the storage means as recited in claim 1.

Neither Banton nor Kenner is relied upon to correct for at least the above noted deficiency of Rhoads. This alone is sufficient to distinguish claim 1 over the combination of Rhoads, Banton and Kenner.

Further, contrary to the Examiner's allegation, Banton cannot be combined with Rhoads in the manner suggested by the Examiner. Banton is purely directed toward correcting for aliasing issues in a bit-mapped image. Banton merely discloses that when a full bit-mapped image data is presented, the image data is scanned to detect whether any 3 x 3 pixels portion of the image data matches the left side of Figure 2C. If such match occurs, the 3 x 3 region is replaced by the pattern on the right side of Figure 2C. *See Banton, Column 5, lines 19 – 52.* The 3 x 3 pixel patterns cannot in any way be interpreted to be equivalent to the original picture data as recited. Therefore, there would be no motivation to combine as alleged by the Examiner.

For at least the above stated reasons, independent claim 1 is distinguishable over the combination of Rhoads, Banton and Kenner.

Independent claim 6 recites, in part "Printing the processed image data, wherein the processed image data includes a portion of the equivalent original picture data read from the storage means that corresponds to the at least the portion of the original picture in the initial image data." It is amply demonstrated above that the combination of Rhoads, Banton and Kenner cannot teach or suggest at least this feature. Also, Banton cannot be combined

as suggested by the Examiner. For at least these reasons, independent claim 6 is distinguishable over the combination of Rhoads, Banton and Kenner.

Independent claim 11 recites, in part "printing the processed image data, wherein the processed image data includes a portion of the equivalent original picture data read from the storage means that corresponds to the at least the portion of the original picture in the initial image data." Clearly, independent claim 11 is distinguishable over the combination of Rhoads, Banton and Kenner.

Claims 2-5, 7-10, 12-15 and 25-27 depend from independent claims 1, 6 and 11 directly or indirectly. For at least due to the dependency thereon, these dependent claims are also distinguishable over the combination of Rhoads, Banton and Kenner.

Applicant respectfully requests that the rejection of claims 1-15 and 25-27 based on Rhoads, Banton and Kenner be withdrawn.

§ 103 REJECTION – RHOADS, BANTON

Claims 16-24 and 28 stand rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Rhoads in view of Banton. *See Office Action, Item 6.* Applicant respectfully traverses.

Independent claim 16 recites, in part "composing an output image data for output such that the at least the portion of the original picture data of the

input image data of the composition input data is replaced with a corresponding portion of the original image data retrieved from the storage in the output image data." In other words, at least some portion of the original image data from storage is included in the output image data.

As amply demonstrated above, the difference image generated as disclosed in Rhoads is completely absent of the original image. Again, this is logical since the original image is subtracted from the suspect image. Also as demonstrated above, Banton cannot correct for at least this deficiency of Rhoads. Further, Banton cannot be combined with Rhoads.

For at least these reasons, independent claim 16 is distinguishable over the combination of Rhoads and Banton. Claims 17-24 and 28 depend from independent claim 16 directly or indirectly. Therefore, for at least due to the dependency thereon, these dependent claims are also distinguishable over the combination of Rhoads and Banton.

Applicant respectfully requests that the rejection of claims 16-24 and 28 based on Rhoads and Banton be withdrawn.

NEW CLAIMS

Claims 29-44 are added through this reply. All new claims are believed to be distinguishable over the cited references individually or in any combination thereof for at least due to being dependent from independent

claims 1, 6, 11 and 16. Applicant respectfully requests that the new claims be allowed.

CONCLUSION

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

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Date: May 26, 2006

By:_____

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